

EXHIBIT A

TO REGISTRATION STATEMENT

Under the Foreign Agents Registration Act of 1938, as amended

*Furnish this exhibit for EACH foreign principal listed in an initial statement
and for EACH additional foreign principal acquired subsequently.*

1. Name and address of registrant Arent, Fox, Kinther, Plotkin & Kahn 1815 H Street, N.W. Washington, D.C. 20006		2. Registration No. 2661
3. Name of foreign principal Outokumpu Oy	4. Principal address of foreign principal Töölönkatu 4 P.O. Box 280 SF-00101 Helsinki 10, Finland	

5. Indicate whether your foreign principal is one of the following type:

- ☐ Foreign government
- ☐ Foreign political party
- ☒ Foreign or ☐ domestic organization: If either, check one of the following:
- | | |
|---|--|
| <input type="checkbox"/> Partnership | <input type="checkbox"/> Committee |
| <input checked="" type="checkbox"/> Corporation | <input type="checkbox"/> Voluntary group |
| <input type="checkbox"/> Association | <input type="checkbox"/> Other (specify) _____ |
- ☐ Individual - State his nationality _____

RECEIVED
CRIMINAL DIVISION
MAR 14 4 40 PM '82
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

6. If the foreign principal is a foreign government, state:

a) Branch or agency represented by the registrant. N.A.

b) Name and title of official with whom registrant deals.

7. If the foreign principal is a foreign political party, state:

a) Principal address N.A.

b) Name and title of official with whom the registrant deals.

c) Principal aim

8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal

Mining and manufacturing of basic metals.

b) Is this foreign principal

Owned by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☐

Directed by a foreign government, foreign political party, or other foreign principal . . . Yes ☐ No ☐

Controlled by a foreign government, foreign political party, or other foreign principal . . Yes ☐ No ☐

Financed by a foreign government, foreign political party, or other foreign principal . . . Yes ☐ No ☐

Subsidized in whole by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☐

Subsidized in part by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☐

See Item 9.

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.) Outokumpu Oy is a state owned company most of whose shares of stock are owned by the Government of Finland. The Social Insurance Institution of Finland owns the next largest percentage of shares. The Government provides some financing for the company, but generally the operations of the company are conducted without interference from the Government. Some government officials serve on the Supervisory Board. Further information regarding the extent of Finnish Government participation in the affairs of Outokumpu Oy is unknown.

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

Date of Exhibit A March 17, 1982	Name and Title John D. Hushon, Partner	Signature 
-------------------------------------	---	--

UNITED STATES DEPARTMENT OF JUSTICE
Washington, D.C. 20530

EXHIBIT B

TO REGISTRATION STATEMENT
Under the Foreign Agents Registration Act
of 1938, as amended

RECEIVED
CRIMINAL DIVISION
OCT 31 1981
FBI
REGISTRATION UNIT

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances, by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in duplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Name of Registrant	Name of Foreign Principal
Arent, Fox, Kintner, Plotkin & Kahn	Outokumpu Oy

Check Appropriate Boxes:

- ☐ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach two copies of the contract to this exhibit.
- ☐ There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach two copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
- ☒ The agreement or understanding between the registrant and foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.
- Describe fully the nature and method of performance of the above indicated agreement or understanding. Pursuant to an oral agreement reached at a conference in New York City on March 5, 1977, and pursuant to consistent course of dealings between the Registrant and the Principal since that time, the Registrant represents the Principal in connection with the activities described in Item 5, below. The Principal is charged on an hourly basis for work done at the Registrant's standard hourly rates, which vary from attorney to attorney, and all direct out-of-pocket expenses are reimbursed to the Registrant. The Registrant has represented the Principal since 1977, but registrable activities ceased for some time, during which the Registrant dropped Outokumpu Oy from its Supplemental Statement. The activities described in Item 5 began on March 10, 1982, and the necessary papers are hereby filed.

5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

In connection

Advice and representation with U.S. international trade matters regarding stainless steel. General representation concerning U.S. business operations and litigation in the United States.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act? ^{1/} Yes ☐ No ☒

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

Date of Exhibit B	Name and Title	Signature
March 18, 1982	John D. Hushon, Partner	<i>John D. Hushon</i>

^{1/} Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.